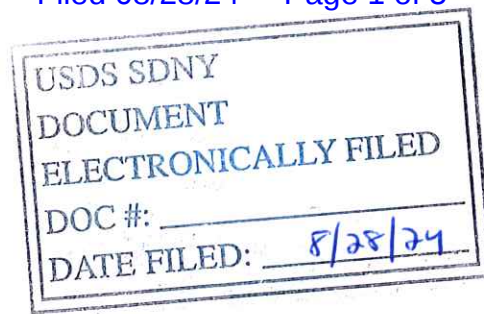


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK



----- x  
UNITED STATES OF AMERICA

- v. -

JORGELINA ABREU GIL,

Defendant.

:  
:  
: CONSENT PRELIMINARY ORDER  
: OF FORFEITURE/  
: MONEY JUDGMENT  
:  
: S1 20 Cr. 199 (KMW)

----- x

WHEREAS, on or about January 28, 2021, JORGELINA ABREU GIL (the “Defendant”), among others, was charged in seven counts of an eight-count Superseding Indictment, S1 20 Cr. 199 (KMW) (the “Indictment”), with false claims, in violation of Title 18, United States Code, Sections 287 and 2 (Count One); theft of Government funds, in violation of Title 18, United States Code, Sections 641 and 2 (Count Two); wire fraud, in violation of Title 18, United States Code, Sections 1343 and 2 (Count Three); health care fraud, in violation of Title 18, United States Code, Sections 1347 and 2 (Count Four); conspiracy to commit wire fraud and health care fraud, in violation of Title 18, United States Code, Section 1349 (Count Five); aggravated identity theft, in violation of Title 18, United States Code, Sections 1028A(a)(1) and (b), and 2 (Count Six); and violation of anti-kickback statute, in violation of Title 42, United States Code, Section 1320a-7b(b)(2) and Title 18, United States Code, Section 2 (Count Seven);

WHEREAS, the Indictment included a forfeiture allegation as to Counts Two and Three of the Indictment, seeking forfeiture to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), of any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offenses alleged in Counts Two and Three of the Indictment, including but not

limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of the offenses charged in Counts Two and Three of the Indictment;

WHEREAS, the Indictment included a second forfeiture allegation as to Counts Four, Five, and Seven of the Indictment, seeking forfeiture to the United States, pursuant to Title 18, United States Code, Section 982(a)(7), of any and all property, real and personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of the offenses alleged in Counts Four, Five, and Seven of the Indictment, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of the offenses charged in Counts Four, Five and Seven of the Indictment;

WHEREAS, on or about November 2, 2021, the Defendant pled guilty to Counts One through Seven of the Indictment, pursuant to a plea agreement with the Government, wherein the Defendant admitted the forfeiture allegation with respect to Counts Two, Three, Four, Five and Seven of the Indictment and agreed to forfeit to the United States: (1) pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), among other things, a sum of money representing proceeds traceable to the commission of the offenses alleged in Counts Two and Three of the Indictment; and (2) pursuant to Title 18, United States Code, Section 982(a)(7), among other things, a sum of money representing proceeds traceable to the commission of the offenses charged in Counts Four, Five and Seven of the Indictment;

WHEREAS, the Defendant consents to the entry of a money judgment in the amount of \$ 8,507,115.19 in United States currency, representing the amount of proceeds traceable to the offenses charged in Counts Two through Five and Seven of the Indictment that the Defendant personally obtained, of which the Defendant is jointly and severally liable with co-defendants JULIO ALVARADO, HECTOR SALAZAR HERRERA, ZORAIDA GONZALEZ, YESENIA

RODRIGUEZ, JOSE RIVERA, FABIAN MORGAN, VICTORIA PLAMA BREA, CHRISTOPHER SANTOS FELIX, JOHN MANUEL MEJIA, JOSE JIMINEZ HILDAGO, FRANCISCO SALAZAR, NELSON DIAZ, and ELIZABETH ARAUJO (the “Co-defendants”), to the extent forfeiture money judgments are entered against the Co-defendants in this case; and

WHEREAS, the Defendant admits that, as a result of acts and/or omissions of the Defendant, the proceeds traceable to the offenses charged in Counts Two through Five and Seven of the Indictment that the Defendant personally obtained cannot be located upon the exercise of due diligence.

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by its attorney Damian Williams, United States Attorney, Assistant United States Attorney Brandon Harper, of counsel, and the Defendant and her counsel, Christopher Madiou, Esq., that:

1. As a result of the offenses charged in Counts Two through Five and Seven of the Indictment, to which the Defendant pled guilty, a money judgment in the amount of \$8,507,115.19 in United States currency (the “Money Judgment”), representing the amount of proceeds traceable to the offenses charged in Counts Two through Five and Seven of the Indictment that the Defendant personally obtained, shall be entered against the Defendant of which the Defendant is jointly and severally liable with the Co-defendants, to the extent forfeiture money judgments are entered against the Co-defendants in this case, shall be entered against the Defendant.

2. Pursuant to Rule 32.2(b)(4) of the Federal Rules of Criminal Procedure, this Consent Preliminary Order of Forfeiture/Money Judgment is final as to the Defendant,

JORGELINA ABREU GIL, and shall be deemed part of the sentence of the Defendant, and shall be included in the judgment of conviction therewith.

3. All payments on the outstanding Money Judgment shall be made by postal money order, bank or certified check, made payable, in this instance, to United States Customs and Border Protection, and delivered by mail to the United States Attorney's Office, Southern District of New York, Attn: Illicit Finance and Money Laundering Unit, 26 Federal Plaza, 38<sup>th</sup> Floor, New York, New York 10278 and shall indicate the Defendant's name and case number.

4. Upon entry of this Consent Preliminary Order of Forfeiture/Money Judgment, and pursuant to Title 21, United States Code, Section 853, United States Customs and Border Protection, or its designee the Office of Fines, Penalties, and Forfeiture shall be authorized to deposit the payment on the Money Judgment into the Treasury Assets Forfeiture Fund, and the United States shall have clear title to such forfeited property.

5. Pursuant to Title 21, United States Code, Section 853(p), the United States is authorized to seek forfeiture of substitute assets of the Defendant up to the uncollected amount of the Money Judgment.

6. Pursuant to Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure, the United States Attorney's Office is authorized to conduct any discovery needed to identify, locate or dispose of forfeitable property, including depositions, interrogatories, requests for production of documents and the issuance of subpoenas.

7. The Court shall retain jurisdiction to enforce this Consent Preliminary Order of Forfeiture/Money Judgment, and to amend it as necessary, pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure.

8. The signature page of this Consent Preliminary Order of Forfeiture/Money Judgment may be executed in one or more counterparts, each of which will be deemed an original but all of which together will constitute one and the same instrument.

AGREED AND CONSENTED TO:

DAMIAN WILLIAMS  
United States Attorney for the  
Southern District of New York


By: /s/  
Brandon D. Harper  
Assistant United States Attorney  
26 Federal Plaza, 38<sup>th</sup> Floor  
New York, NY 10278  
(212) 637-2209

8/22/2024  
DATE

JORGELINA ABREU GIL

By: Jorgelina abreu gil  
JORGELINA ABREU GIL

08/22/2024  
DATE

By:   
CHRISTOPHER MADIOU, ESQ.,  
Attorney for Defendant  
50 Broad Street, Suite 1609  
New York, NY  
(917) 408-6484

8/22/24  
DATE

SO ORDERED:

  
HONORABLE KIMBA M. WOOD  
UNITED STATES DISTRICT JUDGE

8/28/24  
DATE